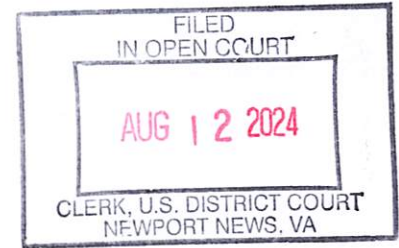


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Newport News Division



UNITED STATES OF AMERICA

v.

BARRY DESOTA ALLEN, SR. a/k/a "B"  
a/k/a "Black" a/k/a "Blaque"  
(Counts 1, 2, 12, 13, 14)

ANDRE DARRISON a/k/a "Dro"  
(Counts 1, 26)

FRANK LOWELL ELEY, JR. a/k/a  
"Nitty"  
(Counts 1, 25)

MANUEL GONZALEZ TORIBIO  
(Counts 1, 2, 21)

NATHA LEANA HOLLOWAY a/k/a  
"Natha Leana Wilder"  
(Counts 1, 2, 24)

ANTONIO LAMON JEFFERSON a/k/a  
"Mon"  
(Counts 1, 17, 22)

TERRANCE JERNIGAN a/k/a "Fatboy"  
a/k/a "Tee"  
(Counts 1, 2, 23)

LEWIS LAMONT JOHNSON a/k/a  
"Bucky"  
(Counts 1, 20)

ALEXANDER LORA a/k/a "Chino" a/k/a  
"Juan Gomez" a/k/a "Pedro Fernandez"  
a/k/a "Richard Lora"  
(Counts 1, 2, 18)

UNDER SEAL

CRIMINAL NO. 4:24-cr-17

21 U.S.C. §§ 846 and 841  
Conspiracy to Distribute and Possess with  
Intent to Distribute Cocaine, Fentanyl, Heroin,  
and Cocaine Base  
(Count 1)

18 U.S.C. § 1956(h)  
Conspiracy to Launder Money  
(Count 2)

21 U.S.C. § 841(a)(1), (b)(1)(B), (b)(1)(C)  
Possession with Intent to Distribute and  
Distribution of Cocaine, Cocaine Base, and  
Fentanyl  
(Counts 3, 4, 5, 7, 8, 10, 11, 12, 14, 15, 22, 28)

18 U.S.C. § 924(c)  
Possession of a Firearm during Drug  
Trafficking  
(Count 16)

21 U.S.C. § 843(b)  
Use of a Communication Facility in  
Furtherance of Drug Trafficking  
(Counts 6, 9, 13, 17, 18, 19, 20, 21, 23, 24, 25,  
26, 27, 29)

18 U.S.C. §§ 922(g)(1) and 924(a)(8)  
Felon in Possession of a Firearm  
(Count 30)

18 U.S.C. §§ 924(d) & 982(a)(1); 21 U.S.C.  
§ 853; 28 U.S.C. § 2461(c)  
Forfeiture

TREVELL LAMONT MANLEY a/k/a )  
"Mont" a/k/a "Jeter" )  
(Counts 1, 27) )  
)  
COREY MCELRATH a/k/a "Cuz" )  
(Counts 1, 15, 16) )  
)  
AARON DAUNTE MELVIN )  
(Counts 1, 7, 8, 9) )  
)  
BRANDON JAMES MONROE )  
(Counts 1, 3, 4, 5, 6, 10, 11) )  
)  
VINCENT CLAY MURPHY a/k/a )  
"Vincent Anthony Murphy" a/k/a/ )  
"Hoppy" a/k/a "Hoppie" a/k/a "Durret" )  
a/k/a "Guy Smith" )  
(Counts 1, 2, 10, 12, 13, 30) )  
)  
ERIC EUGENE NIXON )  
(Counts 1, 28, 29) )  
)  
JONATHAN LUIS RODRIGUEZ )  
(Counts 1, 2, 19) )  
)  
TYRAN DESOTA TRAPP a/k/a "Ty" )  
a/k/a "Cuz" )  
(Counts 1, 2, 14) )

**SUPERSEDING INDICTMENT**

August 2024 Term – at Newport News, Virginia

**COUNT ONE**

THE GRAND JURY CHARGES THAT:

Between in or about 2020 and 2024, in the Eastern District of Virginia and elsewhere, the defendants, BARRY DESOTA ALLEN, SR. a/k/a "B" a/k/a "Black" a/k/a "Blaque," ANDRE DARRISON a/k/a "Dro," FRANK LOWELL ELEY, JR. a/k/a "Nitty," MANUEL GONZALEZ TORIBIO, NATHA LEANA HOLLOWAY a/k/a "Natha Leana Wilder," ANTONIO LAMON

JEFFERSON a/k/a “Mon,” TERRANCE JERNIGAN a/k/a “Fatboy” a/k/a “Tee,” LEWIS LAMONT JOHNSON a/k/a “Bucky,” ALEXANDER LORA a/k/a “Chino” a/k/a “Juan Gomez” a/k/a “Pedro Fernandez” a/k/a/ “Richard Lora,” TREVELL LAMONT MANLEY a/k/a “Mont” a/k/a “Jeter,” COREY MCEL RATH, AARON DAUNTE MELVIN, BRANDON JAMES MONROE, VINCENT CLAY MURPHY a/k/a “Vincent Anthony Murphy” a/k/a/ “Hoppy” a/k/a “Hoppie” a/k/a “Durret” a/k/a “Guy Smith,” ERIC EUGENE NIXON, JONATHAN LUIS RODRIGUEZ, and TYRAN DESOTA TRAPP a/k/a “Ty” a/k/a “Cuz,” did unlawfully, knowingly and intentionally combine, conspire, confederate and agree together with other persons known and unknown to the grand jury to commit the following offenses against the United States:

1. Distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

2. Possess with intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

3. Distribute 400 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

4. Possess with intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

5. Distribute 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

6. Possess with intent to distribute 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

7. Distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

8. Possess with intent to distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

(All in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A), (C).)

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

Between in or about 2020 and 2024, in the Eastern District of Virginia and elsewhere, BARRY DESOTA ALLEN, SR. a/k/a “B” a/k/a “Black” a/k/a “Blaque,” MANUEL GONZALEZ TORIBIO, NATHA LEANA HOLLOWAY a/k/a “Natha Leana Wilder,” TERRANCE JERNIGAN a/k/a “Fatboy” a/k/a “Tee,” ALEXANDER LORA a/k/a “Chino” a/k/a “Juan Gomez” a/k/a “Pedro Fernandez” a/k/a/ “Richard Lora,” VINCENT CLAY MURPHY a/k/a “Vincent Anthony Murphy” a/k/a/ “Hoppy” a/k/a “Hoppie” a/k/a “Durret” a/k/a “Guy Smith,” JONATHAN LUIS RODRIGUEZ, and TYRAN DESOTA TRAPP a/k/a “Ty” a/k/a “Cuz,” the defendants herein, did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree with each other and other persons, both known and unknown, to knowingly, willfully, and unlawfully conduct, attempt to conduct, and cause to be conducted financial transactions affecting interstate commerce, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy to distribute narcotics, in violation of 21 U.S.C. § 846, with the intent to conceal and disguise the carrying on of specified unlawful activity, that is, conspiracy to distribute cocaine, fentanyl, heroin, and cocaine base, in violation of 21 U.S.C. § 846, and that, while conducting and attempting to conduct such financial transactions, the defendants knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

(All in violation of Title 18, United States Code, Section 1956(h).)

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 7, 2022, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, BRANDON JAMES MONROE, did unlawfully, knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II narcotic controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).)

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 13, 2022, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, BRANDON JAMES MONROE, did unlawfully, knowingly and intentionally distribute a mixture or substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance, and a mixture or substance containing a detectable amount of cocaine base, a Schedule II narcotic controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).)

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 1, 2022, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, BRANDON JAMES MONROE, did unlawfully, knowingly and intentionally distribute a mixture or substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).)



COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 1, 2022, in the Eastern District of Virginia and elsewhere, the defendant, BRANDON JAMES MONROE, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, possessing controlled substances with intent to distribute and distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this Indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this Indictment.

(All in violation of Title 21, United States Code, Section 843(b).)

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 4, 2022, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, AARON DAUNTE MELVIN, did unlawfully, knowingly and intentionally distribute a mixture or substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance, and a mixture or substance containing a detectable amount of cocaine base, a Schedule II narcotic controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).)

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 16, 2022, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, AARON DAUNTE MELVIN, did unlawfully, knowingly and intentionally distribute a mixture or substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance, and a mixture or substance containing a detectable amount of cocaine base, a Schedule II narcotic controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).)

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 16, 2022, in the Eastern District of Virginia and elsewhere, the defendant, AARON DAUNTE MELVIN, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this Indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this Indictment.

(All in violation of Title 21, United States Code, Section 843(b).)

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 22, 2022, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendants, BRANDON JAMES MONROE and VINCENT CLAY MURPHY, did unlawfully, knowingly and intentionally distribute a mixture or substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).)

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 8, 2022, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, BRANDON JAMES MONROE, did unlawfully, knowingly and intentionally distribute 40 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).)

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 23, 2022, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendants, BARRY DESOTA ALLEN, SR. and VINCENT CLAY MURPHY, did unlawfully, knowingly and intentionally distribute a mixture or substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).)

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 23, 2022, in the Eastern District of Virginia and elsewhere, the defendants, BARRY DESOTA ALLEN, SR. and VINCENT CLAY MURPHY, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, distributing controlled substances, in violation of Title 21, United States Code, Section 841, as charged in this Indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, 846, as charged in this Indictment.

(All in violation of Title 21, United States Code, Section 843(b).)



COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 28, 2022, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendants, BARRY DESOTA ALLEN, SR. and TYRAN DESOTA TRAPP, did unlawfully, knowingly and intentionally distribute 40 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).)

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 1, 2023, in Newport News, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, COREY MCEL RATH, did unlawfully, knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).)

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 1, 2023, in Newport News, Virginia, in the Eastern District of Virginia, the defendant, COREY MCEL RATH, did unlawfully and knowingly possess a firearm, to wit: a Ruger .380 caliber handgun, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), as charged in Count Fifteen of this Indictment, which is incorporated by reference herein.

(In violation of Title 18, United States Code, Section 924(c)(1)(A).)

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 12, 2023, in the Eastern District of Virginia and elsewhere, the defendant, ANTONIO LAMON JEFFERSON, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as charged in this Indictment.

(All in violation of Title 21, United States Code, Section 843(b).)

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 14, 2023, in the Eastern District of Virginia and elsewhere, the defendant, ALEXANDER LORA, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as charged in this Indictment.

(All in violation of Title 21, United States Code, Section 843(b).)

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 26, 2023, in the Eastern District of Virginia and elsewhere, the defendant, JONATHAN LUIS RODRIGUEZ, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as charged in this Indictment.

(All in violation of Title 21, United States Code, Section 843(b).)

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 27, 2023, in the Eastern District of Virginia and elsewhere, the defendant, LEWIS LAMONT JOHNSON, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as charged in this Indictment.

(All in violation of Title 21, United States Code, Section 843(b).)

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 24, 2023, in the Eastern District of Virginia and elsewhere, the defendant, MANUEL GONZALEZ TORIBIO, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as charged in this Indictment.

(All in violation of Title 21, United States Code, Section 843(b).)



COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 25, 2023, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, ANTONIO LAMON JEFFERSON, did unlawfully, knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).)

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 25, 2023, in the Eastern District of Virginia and elsewhere, the defendant, TERRANCE JERNIGAN, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as charged in this Indictment.

(All in violation of Title 21, United States Code, Section 843(b).)

COUNT TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 25, 2023, in the Eastern District of Virginia and elsewhere, the defendant, NATHA LEANA HOLLOWAY, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as charged in this Indictment.

(All in violation of Title 21, United States Code, Section 843(b).)

COUNT TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 27, 2023, in the Eastern District of Virginia and elsewhere, the defendant, FRANK LOWELL ELEY, JR., did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as charged in this Indictment.

(All in violation of Title 21, United States Code, Section 843(b).)

COUNT TWENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 8, 2023, in the Eastern District of Virginia and elsewhere, the defendant, ANDRE DARRISON, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as charged in this Indictment.

(All in violation of Title 21, United States Code, Section 843(b).)

COUNT TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 20, 2023, in the Eastern District of Virginia and elsewhere, the defendant, TREVELL LAMONT MANLEY, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as charged in this Indictment.

(All in violation of Title 21, United States Code, Section 843(b).)

COUNT TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 7, 2024, in the Eastern District of Virginia and elsewhere, the defendant, ERIC EUGENE NIXON, did unlawfully, knowingly, and intentionally distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).)

COUNT TWENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 7, 2024, in the Eastern District of Virginia and elsewhere, the defendant, ERIC EUGENE NIXON, did unlawfully, knowingly, and intentionally use a communication facility, that is, a telephone, in causing, committing, and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, distribution of cocaine, in violation of Title 21, United States Code, Section 841, as charged in this Indictment, and conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as charged in this Indictment.

(All in violation of Title 21, United States Code, Section 843(b).)



COUNT THIRTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 26, 2024, in the Eastern District of Virginia, the defendant, VINCENT CLAY MURPHY, having knowingly been convicted of a felony crime punishable by imprisonment for a term exceeding one year, knowingly and unlawfully possessed a firearm, to wit: a Glock handgun, said firearm having been transported in interstate and foreign commerce.

(In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).)

FORFEITURE ALLEGATION

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

1. The defendants, if convicted of the violation alleged in Count Two of this Superseding Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, real or personal, involved in the violation, or any property traceable to that property.

2. The defendants, if convicted of any of the violations alleged in Counts One, Three through Fifteen, and Seventeen through Twenty-Nine of this Superseding Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2:

- a. Any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of the violation; and
- b. Any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violation.

3. The defendants, if convicted of any of the violations alleged in this Superseding Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any firearm or ammunition involved in or used in the violation.

4. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

5. The property subject to forfeiture includes but is not limited to: a Glock handgun, as described in Count Thirty, and any related magazines and ammunition.

(In accordance with Title 18, United States Code, Sections 924(d) and 982(a)(1); Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461(c).)

Pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office.

UNITED STATES v. BARRY DESOTA ALLEN, SR., ET AL. 4:24-cr-17

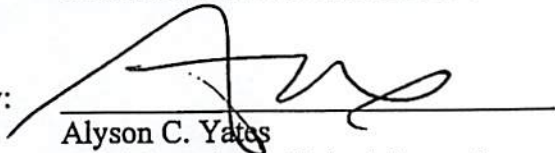
A TRUE BILL:

REDACTED COPY

\_\_\_\_\_  
FOREPERSON

JESSICA D. ABER  
UNITED STATES ATTORNEY

By:



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